

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	CHAPTER 11
PASADENA SELF-STORAGE, LTD.,	§	CASE NO. 10-33790
	§	
	§	
DEBTOR.	§	

**OBJECTION TO DEBTOR'S EXPEDITED
MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES OF ASSETS AND LIABILITIES
AND STATEMENT OF AFFAIRS**

(relates to docket no. 7)

Comes now City National Bank, successor to Imperial Capital Bank, (the "Bank") and files its Objection to Debtor's Expedited Motion for Extension of Time to File Schedules of Assets and Liabilities and Statement of Affairs and would state as follows:

1. On May 4, 2010, Pasadena Self-Storage, Ltd. (the "Debtor") filed its Voluntary Petition under Chapter 11 of the United States Bankruptcy Code.

2. The Debtor asserts in its Voluntary Petition that this case is a single asset bankruptcy case. Based on the List of Creditors Holding 20 Largest Unsecured Claims filed on May 4, 2010 (the "20 Largest List") (docket no. 2), the Debtor has so few creditors that it has listed its secured creditors on the 20 Largest List (Imperial Capital Bank and Leo Vasquez), along with the unsecured creditors. The final unsecured creditor listed by the Debtor on the 20 Largest List is only owed \$376.91.

3. On May 17, 2010, the Debtor filed an Expedited Motion for Extension of Time to File Schedules of Assets and Liabilities and Statement of Affairs (the "Expedited Motion") (docket no. 7). In the Expedited Motion, the Debtor does not give a reason on why an extension is requested or should be granted. The Debtor merely states that "The Debtor originally

anticipated having the Schedules and Statement of Affairs timely filed, but now finds that additional time is needed.”

4. Pursuant to the Federal Rules of Bankruptcy Procedure 1007(c)

In a voluntary case, the schedules, statements and other documents required by subdivision (b)(1),(4), (5), and (6) shall be filed with the petition or within 14 days thereafter.... Except as provided in § 1116(3), any extension of time to file schedules, statements, and other documents required under this rule may be granted only on motion for cause shown and on notice to the United States trustee, any committee elected under § 705 or appointed under § 1102 of the Code, trustee, examiner, or other party as the court may direct.

FRBP 1007(c). The filing deadlines of this rule are mandatory and require strict adherence. *In re Greene*, 127 B.R. 805 (Bkrtcy N.D. Ohio, 1991). Bankruptcy Rule 1007, in conjunction with sections 521 and 343 of the Code and Bankruptcy Rule 2015(a), compels complete and accurate disclosures. *In re Olmstead*, 220 B.R. 986 (Bkrtcy D.N.D. 1998). Here, in a small case, without any reasonable explanation of the need for additional time, the Debtor requests to be excused from its duties.

5. Pursuant to Federal Rules of Bankruptcy Procedure 1007(a)(1), the Debtor was required to file, along with the Voluntary Petition, the names and addresses of all creditors of the Debtor. The Bank can only assume that the Debtor, in place of filing a separate list of all of the names and addresses of its creditors, had so few creditors that the Debtor listed all of its creditors, secured and unsecured, on the 20 Largest List.

Wherefore, Premises Considered, City National Bank prays that the Court deny Pasadena Self-Storage, Ltd.’s Expedited Motion for Extension of Time to File Schedules of Assets and Liabilities and Statement of Affairs and for such other and further relief as is equitable and just.

Respectfully submitted this 18th day of May, 2010.

HIRSCH & WESTHEIMER, P.C.

By: /s/ Michael J. Durrschmidt
Michael J. Durrschmidt
Texas Bar No. 06287650
700 Louisiana, Floor 25
Houston, Texas 77002
Telephone: 713-220-9165
Facsimile: 713-223-9319
E-mail: mdurrschmidt@hirschwest.com

Attorneys for City National Bank

Certificate of Service

I hereby certify that on the 18th day of May, 2010, a copy of the foregoing Objection to the Expedited Motion for Extension of Time to File Schedules of Assets and Liabilities and Statement of Affairs was served on the parties on the attached service list by first class mail, postage prepaid, and/or the Clerk of the Court via the ECF system.

/s/ Michael J. Durrschmidt
Michael J. Durrschmidt

Service List

Pasadena Self-Storage, Ltd.
3030 Old Ranch Parkway, Suite 190
Seal Beach, CA 90740

Patrick D Devine
5120 Woodway Dr., Suite 8002
Houston, Texas 77056

Christine A March
Office of the United States Trustee
515 Rusk St., Suite 3516
Houston, Texas 77002

Jason Starks
Assistant Attorney General
c/o Sherri K. Simpson
PO Box 12548
Austin, Texas 78711

Tara Grundemeier
Lienbarger Goggan Blair & Sampson LLP
PO Box 3064
Houston, Texas 77253

Imperial Capital Bank
500 N Brand Blvd., Suite 1500
Glendale, CA 91203

Leo Vasquez
Harris Co. Tax Assessor
PO Box 4622
Houston, Texas 77210

East Bay Construction
2124 Main Street, Suite 145
Huntington Beach, CA 92648

Texas State Comptroller
PO Box 149348
Austin, Texas 78714

Goodrich Goodyear & Hinds
6700 E Pacific Coast Hwy, Suite 255
Long Beach, CA 90803

AFS/EBEX Financial Services
PO Box 10045
Pasadena, CA 91189

Best Publications
100 Perkins Street, Suite C
League City, TX 77573

W.B. Lockhart & Co
PO Box 35375
Houston, Texas 77235

Yellow Book USA – West
PO Box 660052
Dallas, Texas 75266

EMR Services
2931 Thorne Creek
Houston, Texas 77073

Reliant Energy
PO Box 650475
Dallas, Texas 75265

AT&T
PO Box 5001
Carol Stream, IL 60197

Golf Carts of Houston Mgmt
d/b/a South Houston Golf Carts
3123 Westside Drive
Pasadena, TX 77504

AT&T Advertising Solutions
PO Box 5010
Carol Stream, IL 60197

C&C Contractors
5128 Eula Avenue
Pasadena, Texas 77505

G5 Search Marketing, Inc.
550 NW Franklin Avenue, Suite 200
Bend, OR 97701

Phonesmart
Box U
Columbia, MO 65205

On the Move, Inc.
PO Box 1137
Boerne, Texas 78006

Salinas Installations
12303 Gulf Freeway, Apt. 1604
Houston, Texas 1604

Purchase Power
PO Box 856042
Louisville, KY 40285